

**CUSTOMER NO.: 24498**  
**Ser. No. 10/517,466**  
**Office Action dated: 03 October 2007**  
**Response dated: 30 January 2008**

**PATENT**  
**PU020268**

**REMARKS/ARGUMENTS**

**35 U.S.C. 103**

Claims 1 and 14 have been rejected under 35 USC 103(a) as being unpatentable over Griswold et al. (US-2003/0156566) in view of Bloebaum (US 6,535,815). Claims 1-8 and 10-18 have been rejected under 35 U.S.C. 102(e) as being anticipated by Katz et al. (US-2006/0291455) in view of Bloebaum. The Applicants assume that the Examiner's rejection under 35 USC 102 is meant to reject these Claims under 35 USC 103.

U.S. Publication 2003/0156566 to Griswold et al. relates to an internet working of a WLAN with a cellular system. Nowhere does the reference show or suggest:

"means for detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network.",

as specifically recited in Claim 1 as amended.

Furthermore, nowhere does Griswold et al. teach or suggest the step of:

"detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said

public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network.",

as specifically set forth in Claim 14.

Bloebaum relates to a mobile terminal having a GPS receiver. A GPS receiver tends to be slow. Therefore, aiding data such as orbits (ephemeris) long term orbital information (almanac), corrections for clock and ionosphere propagation delays, a list of satellites "in view", time information, and other data is used to speed up the GPS. Nowhere does Bloebaum show or suggest:

" means for detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network.",

as specifically recited in Claim 1 as amended. Nowhere does Bloebaum show or suggest comparison of routing area identifiers. Furthermore, since Bloebaum incorporates his GPS receiver into his mobile terminal, nowhere does Bloebaum show or suggest:

"an interface for connecting networks, comprising an interworking function provided between a wireless local area network and a public mobile land network",

as recited in Claim 1. It is therefore clear that even if the subject matter of Bloebaum were to be added to the subject matter of Griswold et al, the

patentability of the instant invention, as defined by Claim 1 as amended would not be affected.

Similarly nowhere do either Griswold et al. or Bloebaum show or suggest:

"detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network",

as specifically recited in Claim 14. Furthermore, nowhere does Bloebaum show or suggest:

"interfacing the wireless local area network to the universal mobile telecommunications system network by providing interfaces towards the universal mobile telephone system and the wireless local area network using an interworking function",

as recited in Claim 14. It is therefore clear that even if the subject matter of Bloebaum were to be added to the subject matter of Griswold et al, the patentability of the instant invention as defined by Claim 14 would not be affected.

Cited U.S. Patent Publication 2006/0291455 to Katz et al. relates to an interface between PLMN and non-PLMN networks. Non-cellular devices attempting to access PLMN networks through non-PLMN networks appear as cellular devices to the PLMN network. Nowhere does Katz et al show or suggest:

"means for detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network.",

as specifically recited in Claim 1 as amended. Nowhere does Katz et al show or suggest any comparison of routing area identifiers. Furthermore, nowhere does Katz et al. show or suggest:

"detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network.",

as specifically recited in Claim 14.

The Examiner has admitted that Katz fails to teach that the movement of a mobile station may be detected by comparing a local area identifier with a PLMN identifier, and uses Bloebaum to supply the material which is lacking in Katz et al. The Applicants respectfully request the Examiner to reconsider his analysis of Bloebaum.

Nowhere does Bloebaum show or suggest:

"means for detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with

said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network.",

as specifically recited in Claim 1 as amended. Furthermore, since Boebaum incorporates his GPS receiver into his mobile terminal, nowhere does Bloebaum show or suggest:

"an interface for connecting networks, comprising an interworking function provided between a wireless local area network and a public mobile land network",

as recited in Claim 1. Furthermore nowhere does Bloebaum show or suggest the step of:

"detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network.",

as specifically set forth in Claim 14. In fact, nowhere does Bloebaum perform any comparison of routing area identifiers. Additionally, nowhere does Bloebaum show or suggest:

"interfacing the wireless local area network to the universal mobile telecommunications system network by providing interfaces towards the universal mobile telephone system and the wireless local area network using an interworking function",

as recited in Claim 14. It is therefore clear that even if the structure of Bloebaum were to be incorporated into the structure of Katz et al, the patentability of the instant invention as defined by Claims 1 and 14 would not be affected.

Claims 2-13 are dependent from Claim 1 and set forth further advantageous features. The Applicants submit that these subclaims are patentable as their parent Claim 1.

Similarly, Claims 15-18 are dependent from Claim 14 and set forth further advantageous features. The Applicants submit that these subclaims are patentable as their parent Claim 14.

Dependent Claim 9 has been rejected as unpatentable over Katz et al. in view of Bloebaum and Lundin (US-2004/0037269). Lundin relates to an interworking arrangement in which a mobile station requests a given level of quality of service. The network provides a level of quality of service depending on several factors. Nowhere does Lundin show or suggest:

"means for detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network.",

as specifically set forth in Claim 1 as amended, which is the parent of Claim 9. In fact, nowhere does Lundin show or suggest any comparison of routing area identifiers. It is therefore clear that even if the structures of Katz et al, Bloebaum and Lundin were to be combined, the patentability of Claim 9 would not be affected .

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The Applicants submit that the instant application is now in condition for allowance. A notice to that effect is respectfully solicited.

Please charge the fee for the Petition for a One Month Extension, and any other costs that may be associated with the filing of this Response, to Deposit Account No. 07-0832.

Respectfully submitted,

SHAHLY VERMA ET AL.

By:

  
Daniel E. Sragow  
Attorney for Applicants  
Registration No.: 22,856  
(609) 734-6832

CAF:DES

Patent Operations  
Thomson Licensing LLC  
P.O. Box 5312  
Princeton, NJ 08543-5312

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